

EXHIBIT A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

[INSERT PLAINTIFF(S) NAME(S)]

Member Case No.:

[INSERT Member Case No. if available]

**MASTER SHORT-FORM COMPLAINT
AND DEMAND FOR JURY TRIAL**

The Plaintiff(s) named below file(s) this *Short-Form Complaint and Demand for Jury Trial* against the Defendants named below by and through the undersigned counsel. Plaintiff(s) incorporate(s) by reference the allegations, claims, and relief sought in *Plaintiffs' Second Amended Master Complaint (Personal Injury)* ("Second Amended Master Complaint") (ECF No. 494) as it relates to the named Defendants (checked-off below), filed in *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, MDL No. 3047 in the United States District Court for the Northern District of California. Plaintiff(s) file(s) this *Short-Form Complaint* as permitted by the Second Amended Stipulated Implementation Order Governing Adoption of Master Complaint (Personal Injury) and Short-Form Complaints for Filed Cases and by Case Management Order No. 7 (ECF No. 479).

As necessary herein, Plaintiff(s) may include: (a) additional Causes of Action and supporting allegations against Defendants, as set forth in Section III in additional sheets attached hereto; and/or (b) additional claims and allegations against other Defendants not listed in the *Second Amended Master Complaint*, and may attach additional sheets hereto.

Plaintiff(s) indicate by checking boxes below the Parties and Causes of Actions specific to Plaintiff(s)' case.

Plaintiff(s), by and through their undersigned counsel, allege as follows:

I. DESIGNATED FORUM

A. *For Direct Filed Cases:* Identify the Federal District Court in which the Plaintiff(s) would have filed in the absence of direct filing:

B. *For Transferred Cases:* Identify the Federal District Court in which the Plaintiff(s) originally filed and the date of filing:

II. IDENTIFICATION OF PARTIES

A. PLAINTIFF

1. *Plaintiff:* Name of the individual injured due to use of Defendant(s)' social media products:

2. Age at time of filing: _____

3. City(ies) and state(s) where Plaintiff primarily used Defendants' platforms:

4. Last Name and State of Residence of *Guardian Ad Litem*, if applicable:

5. Name of the individual(s) that allege damages for loss of society or consortium (*Consortium Plaintiff(s)*) and their relationship to Plaintiff, if applicable:

6. *Survival and/or Wrongful Death Claims, if applicable:*

(a) Name of decedent and state of residence at time of death:

(b) Date of decedent's death:

(c) Name and capacity (*i.e.* executor, administrator, etc.) of Plaintiff(s) bringing claim for decedent's wrongful death:

7. At the time of the filing of this *Short-Form Complaint*, Plaintiff(s) are residents and citizens of *[Indicate State]*:

B. DEFENDANT(S)

Plaintiff(s) name(s) the following Defendants in this action *[Check all that apply]*:

META ENTITIES

- ☐ META PLATFORMS, INC.,
formerly known as Facebook, Inc.
- ☐ INSTAGRAM, LLC
- ☐ FACEBOOK PAYMENTS, INC.
- ☐ SICULUS, INC.
- ☐ FACEBOOK OPERATIONS, LLC

TIKTOK ENTITIES

- ☐ BYTEDANCE LTD.
- ☐ BYTEDANCE INC.
- ☐ TIKTOK LTD.
- ☐ TIKTOK LLC.
- ☐ TIKTOK INC.

SNAP ENTITY

- ☐ SNAP INC.

GOOGLE ENTITIES

- ☐ GOOGLE LLC
- ☐ YOUTUBE, LLC

OTHER DEFENDANTS

For each “Other Defendant” Plaintiff(s) contend(s) are additional parties and are liable or responsible for Plaintiff(s) damages alleged herein, Plaintiffs must identify by name each Defendant and its citizenship, and Plaintiff(s) must plead the specific facts supporting any claim against each “Other Defendant” in a manner complying with the requirements of the Federal Rules of Civil Procedure. In doing so, Plaintiff(s) may attach additional pages to this *Short-Form Complaint*.

	NAME	CITIZENSHIP
1		
2		
3		
4		

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C. PRODUCT USE

Plaintiff used the following Social Media Products that substantially contributed to their injury/ies (check all that apply, and identify approximate dates of use, to the best of Plaintiff's recollection):

☐ FACEBOOK

Approximate dates of use: _____ to _____

☐ INSTAGRAM

Approximate dates of use: _____ to _____

☐ SNAPCHAT

Approximate dates of use: _____ to _____

☐ TIKTOK

Approximate dates of use: _____ to _____

☐ YOUTUBE

Approximate dates of use: _____ to _____

☐ OTHER:

Social Media Product(s) Used	Approximate Dates of Use

D. PERSONAL INJURY¹

Plaintiff(s) experienced the following personal injury/ies alleged to have been caused by Defendant(s)' Social Media Products [*Check all that apply*]:

☐ **ADDICTION/COMPULSIVE USE**

☐ **EATING DISORDER**

☐ Anorexia

☐ Bulimia

☐ Binge Eating

☐ Other: _____

☐ **DEPRESSION**

☐ **ANXIETY**

☐ **SELF-HARM**

☐ Suicidality

☐ Attempted Suicide

☐ Death by Suicide

☐ Other Self-Harm: _____

☐ **CHILD SEX ABUSE**

☐ **CSAM VIOLATIONS**

☐ **OTHER PHYSICAL INJURIES (SPECIFY):**

¹ Plaintiff(s) must check-off all injuries allegedly caused by Plaintiff's use of Defendant(s)' Social Media Products. Plaintiff is not required to plead here emotional or psychological injuries inherent in injuries otherwise identified, or all manifestations of the injury alleged which will be inquired into as part of the Plaintiff's Fact Sheet ("PFS"). This *Short-Form Complaint* assumes that emotional and psychological injuries are asserted by Plaintiff in connection with any injury otherwise identified.

III. CAUSES OF ACTION ASSERTED

The following Causes of Action asserted in the *Second Amended Master Complaint*, and the allegations with regard thereto, are adopted in this *Short Form Complaint* by reference (*check all that are adopted*):

Asserted Against ²	Count Number	Cause of Action (CoA)
<input type="checkbox"/> Meta entities <input type="checkbox"/> Snap entity <input type="checkbox"/> TikTok entities <input type="checkbox"/> Google entities <input type="checkbox"/> Other Defendant(s) ## _____ ³	1	STRICT LIABILITY - DESIGN DEFECT
<input type="checkbox"/> Meta entities <input type="checkbox"/> Snap entity <input type="checkbox"/> TikTok entities <input type="checkbox"/> Google entities <input type="checkbox"/> Other Defendant(s) ## _____	2	STRICT LIABILITY - FAILURE TO WARN
<input type="checkbox"/> Meta entities <input type="checkbox"/> Snap entity <input type="checkbox"/> TikTok entities <input type="checkbox"/> Google entities <input type="checkbox"/> Other Defendant(s) ## _____	3	NEGLIGENCE - DESIGN
<input type="checkbox"/> Meta entities <input type="checkbox"/> Snap entity <input type="checkbox"/> TikTok entities <input type="checkbox"/> Google entities <input type="checkbox"/> Other Defendant(s) ## _____	4	NEGLIGENCE – FAILURE TO WARN
<input type="checkbox"/> Meta entities <input type="checkbox"/> Snap entity <input type="checkbox"/> TikTok entities <input type="checkbox"/> Google entities <input type="checkbox"/> Other Defendant(s) ## _____	5	NEGLIGENCE

² For purposes of this paragraph, “entity” means those defendants identified in Section II.B (*e.g.*, “TikTok entities” means all TikTok defendants against which Plaintiff(s) is asserting claims).

³ Reference selected Other Defendants by the corresponding row number in the “Other Defendant(s)” chart above, in Section II.B.

1	<input type="checkbox"/> Meta entities	7	VIOLETION OF UNFAIR TRADE
2	<input type="checkbox"/> Snap entity		PRACTICES/CONSUMER PROTECTION LAWS
3	<input type="checkbox"/> TikTok entities		<i>Identify Applicable State Statute(s):</i> _____
4	<input type="checkbox"/> Google entities		_____
	<input type="checkbox"/> Other Defendant(s)		
	## _____		
5	<input type="checkbox"/> Meta entities	8	FRAUDULENT CONCEALMENT AND
6	<input type="checkbox"/> Other Defendant(s)		MISREPRESENTATION (Against Meta only)
	## _____		
7	<input type="checkbox"/> Meta entities	9	NEGLIGENT CONCEALMENT AND
8	<input type="checkbox"/> Other Defendant(s)		MISREPRESENTATION (Against Meta only)
	## _____		
9	<input type="checkbox"/> Meta entities	10	NEGLIGENCE <i>PER SE</i>
10	<input type="checkbox"/> Snap entity		
11	<input type="checkbox"/> TikTok entities		
	<input type="checkbox"/> Google entities		
	<input type="checkbox"/> Other Defendant(s)		
	## _____		
12	<input type="checkbox"/> Meta entities	12	VIOLATIONS OF 18 U.S.C. §§ 2255 and 2252 (Civil
13	<input type="checkbox"/> Other Defendant(s)		remedy Certain activities relating to material involving
	## _____		the sexual exploitation of minors) (Against Meta only)
14	<input type="checkbox"/> Meta entities	14	VIOLATIONS OF 18 U.S.C. §§ 2255 and 2252A(5)(b)
15	<input type="checkbox"/> Other Defendant(s)		(Civil remedy for Certain activities relating to material
16	## _____		constituting or containing child pornography) (Against
			Meta only)
17	<input type="checkbox"/> Meta entities	16	WRONGFUL DEATH
18	<input type="checkbox"/> Snap entity		
19	<input type="checkbox"/> TikTok entities		
20	<input type="checkbox"/> Google entities		
	<input type="checkbox"/> Other Defendant(s)		
	## _____		
21	<input type="checkbox"/> Meta entities	17	SURVIVAL ACTION
22	<input type="checkbox"/> Snap entity		
23	<input type="checkbox"/> TikTok entities		
24	<input type="checkbox"/> Google entities		
	<input type="checkbox"/> Other Defendant(s)		
	## _____		
25	<input type="checkbox"/> Meta entities	18	LOSS OF CONSORTIUM AND SOCIETY
26	<input type="checkbox"/> Snap entity		
27	<input type="checkbox"/> TikTok entities		
	<input type="checkbox"/> Google entities		
	<input type="checkbox"/> Other Defendant(s)		
28	## _____		

1 **IV. ADDITIONAL CAUSES OF ACTION**

2 **NOTE**

3 If Plaintiff(s) wants to allege additional Cause(s) of Action other than those selected in Section III,
 4 which are the Causes(s) of Action set forth in the *Second Amended Master Complaint*, the facts
 5 supporting those additional Cause(s) of Action, must be pled in a manner complying with the
 6 requirements of the Federal Rules of Civil Procedure. In doing so, Plaintiff(s) may attach additional
 7 pages to this *Short-Form Complaint*.

8 Plaintiff(s) assert(s) the following additional Causes of Action and supporting allegations against
 9 the following Defendants:

15 **WHEREFORE**, Plaintiff(s) pray(s) for relief and judgment against Defendants and all such
 16 further relief that this Court deems equitable and just as set forth in the *Second Amended Master*
 17 *Complaint*, and any additional relief to which Plaintiff(s) may be entitled.

18 **JURY DEMAND**

19 Plaintiff(s) hereby demand a trial by jury as to all claims in this action.

20 *****

21 By signature below, Plaintiff's counsel hereby confirms their submission to the authority
 22 and jurisdiction of the United States District Court for the Northern District of California for
 23 oversight of counsel's duties under Federal Rule of Civil Procedure 11, including enforcement as
 24 necessary through sanctions and/or revocation of *pro hac vice* status.

25 /s/ Signature

26 Name

27 Firm

28 Address

Phone

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Fax
Email

Attorneys for Plaintiff(s)